

# **Graduate Medical Education**

<b>Graduate Medical Education Policy</b>	USMLE Step 3 / COMLEX Level 3	
Facility/Sponsor	CMC/GMEC	
Policy Origin Date	February 2008	
Revision Date	November 2025	

### **PURPOSE**

State licensing boards require that physicians pass a national licensing examination as a prerequisite for obtaining a medical license to practice independently in the United States; either the United States Medical Licensing Examination (USMLE) for allopathic (MD) students or the Comprehensive Osteopathic Medical Licensing Examination (COMLEX) taken by osteopathic (DO) students. These exams are designed to assess a physician's knowledge, clinical skills, and communication skills. Both the USMLE and COMLEX exams consist of three parts; the first two parts are typically taken during medical school. Passing the first two examinations in the series is a prerequisite for beginning graduate medical education training. The third and final part of the exam is typically taken during residency training.

While osteopathic applicants are not nationally required to submit USMLE scores for licensure, many accredited programs under the purview of Carilion Medical Center (CMC) do require osteopathic candidates submit for consideration their USMLE Step 1 and 2 scores along with the required COMLEX scores.

### **SCOPE**

This policy applies to all residents in categorical ACGME accredited post-graduate training programs sponsored by Carilion Medical Center (CMC). This policy does not apply to allopathic (MD) or osteopathic (DO) residents in Preliminary Surgery or Preliminary Medicine residency programs.

### **DEFINITIONS**

**United States Medical Licensing Examination (USMLE) Step 3:** a three-step exam that medical school graduates must pass to be eligible for a medical license in the United States. It is co-owned by the Federation of State Medical Boards (FSMB) and the National Board of Medical Examiners (NBME) and is used by state medical boards to assess a candidate's ability to apply medical knowledge concepts and patient-centered skills. The three steps are: Step 1 (basic sciences), Step 2 CK (clinical knowledge), and Step 3 (patient management).

Comprehensive Osteopathic Medical Licensing Examination (COMLEX) Level 3: a three-part exam series required for the licensure of osteopathic physicians in the United States. It assesses a candidate's knowledge and clinical skills in osteopathic medicine and consists of three levels: Level 1, Level 2-CE, and Level 3. Each level must be passed to graduate from medical school and progress in graduate medical education (residency).

**Post Graduate Year (PGY):** a term used to denote the progress of residents in medical, dental, and podiatry training programs after they have graduated from medical school. For example, a PGY-1 is in their first year of residency, and a PGY-3 is in their third year of training.

**Education Commission for Foreign Medical Graduates (ECFMG):** a non-profit organization that assesses the qualifications of international medical graduates (IMGs). ECFMG certification is required for IMGs to enter accredited U.S. residency or fellowship programs and is a prerequisite for taking the third step of the U.S. Medical Licensing Examination (USMLE). The

certification process involves verifying medical credentials, passing a series of exams, and demonstrating clinical and communication skills.

**National Resident Matching Program (NRMP)/The Match:** a private, non-profit organization that uses a mathematical algorithm to match applicants with residency and fellowship positions in the United States. Known as "The Match," this process provides a uniform and fair system for medical school graduates to be placed in training programs after they apply, interview, and rank their preferences.

**Graduate Medical Education Committee (GMEC):** a governing body within a teaching hospital or medical school that oversees and is responsible for all its ACGME-accredited residency and fellowship programs. Its main duties include ensuring the quality of the educational and work environment, overseeing program compliance with accreditation standards, and establishing and implementing institutional policies related to GME.

#### **PROCEDURE**

- 1. Conditions for reappointment and promotion require satisfactory completion of the training period and fulfillment of the requisites of the program and institution signifying readiness to progress to the next level of training in the program. See GME Discipline Promotion and Advancement Policy for more details.
- 2. Residents who have successfully matched into an ACGME-accredited CMC program are notified of the following in their PGY1 employment contracts:
  - a. Allopathic Trainees (MD, MBBS, MBChB, etc.) are required to:
    - i. Begin residency training having passed both step 1 and 2 of the USMLE
    - ii. Take the USMLE Step 3 exam during the first twelve months of their PGY1 year; typically, by June 30 of the PGY1 year
    - iii. Successfully pass USMLE Step 3 no later than six (6) months into the PGY2 year of training; typically, by December 31st of the PGY1 year.
  - b. Osteopathic residents (DO) are required to:
    - i. Begin residency training having passed both step 1 and 2 of the COMLEX exam
      - 1. Some CMC training programs may require osteopathic candidates take the USMLE step 2 exam in addition to the COMLEX exams. This requirement is at the program's discretion.
    - ii. Take either the USMLE Step 3 or the COMLEX Level 3 exam during the first twelve months of their PGY1 year; typically, by June 30<sup>th</sup> of the PGY1 year
    - iii. Successfully pass either the USMLE Step 3 or the COMLEX Level 3 no later than six (6) months into the PGY2 year of training; typically, by December 31st of the PGY2 year.
  - c. Dermatology Residents
    - Dermatology residents begin training at CMC at the PGY2 level and have until June 30<sup>th</sup> of their PGY2 year to take their USMLE Step 3 or COMLEX Level 3. Dermatology residents must pass their respective third exam by December 31<sup>st</sup> of their PGY3 year.
  - d. International Medical Graduates
    - i. International Medical Graduates who are applying for residency must pass USMLE steps 1 and 2 and become certified by the ECFMG before they can participate in The NRMP Match.

ii. International Medical Graduates who hold a categorical position at a CMC GME program will be held to the same standards as allopathic and osteopathic graduates from domestic schools.

#### e. Fellows

i. Prior to applying to CMC programs, fellowship applicants must have passing scores for all three levels of either the USMLE or COMLEX exam depending on their type of medical degree.

# 3. Exam Extensions

- a. Program Directors may petition the Graduate Medical Education Committee in advance for a one-time exemption for residents who have not yet taken the exam within the first twelve months of training, or who have failed to successfully pass the required exam by six months into their PGY2 year of training.
- b. The one-time exemption will allow the resident to receive a six-month extension to successfully complete the required exam.
- c. Failure to successfully pass the examination by the end of the six-month extension (end of PGY2 year) will result in non-renewal of contract and dismissal from the training program. See GME Discipline policies.
- d. Residents who are granted an exception should:
  - i. Be in good standing within the program and meet other program requirements.
  - ii. Have reasonable expectations of passing the exam-during the six-month extension.
- e. A majority vote by the GMEC will approve the extension.

### 4. Unsuccessful Examinations

a. Trainees who are unsuccessful in passing the third examination in either the USMLE or COMLEX series will be subject to remediation including but not limited to non-promotion to the next level of training until the third examination is passed, or potentially non-renewal of contract in the event the trainee is unable to pass. See GME Discipline policies.

# 5. Examination Fees

a. Trainees are responsible for all costs associated with taking both the USMLE and COMLEX exams.

### 6. Time Off and Hours Worked

- a. Programs will grant trainees time off, including travel time, to take the exam without being required to use allotted vacation or other leaves of absence.
- b. Trainees should count the time in which they are taking the exams as time worked. Those hours should be logged in their timecards.

Designated Institutional Official	Reviewing Committee	Date Approved
Daniel Harrington, MD	GMEC	2008
Donald Kees, MD	GMEC	August, 2013
Donald W. Kees, MD	GMEC	April, 2016
Donald W. Kees, MD	GMEC	July 16, 2019
Arthur Ollendorff, MD	GMEC	October 18, 2022
Arthur Ollendorff, MD	GMEC	November 18, 2025